

1 TESTIMONY OF JODY AJAR  
2 DTE 05-27  
3 ON BEHALF OF UNITED STEELWORKERS OF AMERICA

4 Exh. \_\_\_\_\_  
5 Marked: \_\_\_\_\_  
6  
7

8 Q: Please state your name, age, highest educational degree attained, employment  
9 status and title at Bay State Gas Company.

10  
11 A: My name is Jody Ajar; I am 38 years old. I have a high school degree. I am  
12 currently employed by Bay State Gas Company (“Company”) as a Senior Universal  
13 Representative at the Springfield, Massachusetts Call Center (“Call Center”).

14  
15 Q: Do you hold a position with the United Steelworkers of America or its local  
16 affiliate, USWA Local 12026?

17  
18 A: Since the Union was certified in December 1999, I have served as the Unit  
19 Chairperson for the Clerical Technical Bargaining Unit represented by USWA Local  
20 12026. I do not hold any position within Local 12026’s parent union, the USWA.

21  
22 Q: What is the purpose of your testimony?

23  
24 A: To address topics relating to the quality of customer service provided at the  
25 Springfield, Massachusetts Call Center owned and managed by the Company, which  
26 provides customer service assistance to customers of both Bay State Gas Company and  
27 Northern Utilities. Additionally, to provide information regarding the status of  
28 outstanding and on-going contractual obligations between the Company and the United  
29 Steelworkers of America that continues through the rate year (2006) and beyond.  
30 Finally, to provide information related to the likelihood and impact of the Company  
31 outsourcing Union members’ jobs to IBM Global Services (“IBM”) or a second-tier  
32 provider selected by IBM.

1  
2 Q: How many members does the Technical-Clerical Unit of Local 12026 have?  
3 What departments do they work in?

4  
5 A: The Technical-Clerical Unit has approximately 100 members. Most work in the  
6 Call Center; the others are spread throughout the Springfield and Ludlow, Massachusetts  
7 facilities within various Company departments. All bargaining unit members perform  
8 clerical and/or customer service work.

9  
10 Q: How are labor relations between the Company and the Technical-Clerical Unit  
11 governed?

12  
13 A: All terms and conditions of employment between the Company and the United  
14 Steelworkers of America, Local 12026 Clerical-Technical Unit are currently governed by  
15 a collective bargaining agreement between the United Steelworkers of America  
16 ("USWA") and the Company. The Agreement is effective from May 14, 2004 to May  
17 15, 2010.

18  
19 Q: How long have you been employed by Bay State Gas Company? State the title  
20 and the duration of all positions in which you have worked at Bay State.

21  
22 A: I have worked at the Company since May 1988. Since I began work at the  
23 Company, I have always worked in the Springfield, Massachusetts Call Center ("Call  
24 Center"). I started working at the Call Center as a Billing Specialist; my official title was  
25 Customer Service Representative ("CSR"). I worked in this position for approximately 7-  
26 8 years. I then bid for and received the position of Senior Billing Representative. I  
27 worked in this position for 7-8 years. I became a Universal Senior Representative in  
28 August 2004, after the United Steelworkers of America and the Company negotiated

1 Memorandums of Agreement changing the job duties of representatives and senior  
2 representatives performing billing, credit, and service functions at the Call Center.

3  
4 Q: Prior to the Union and the Company executing memorandums of agreement on  
5 the Universal Representative and Senior Universal Representative positions, how were  
6 credit, billing, and service job duties delegated?

7  
8 A: Prior to the development of the Universal Representative and Senior  
9 Representative Positions in 2003 and 2004 respectively, service, billing and credit were  
10 different departments within the Call Center. Incoming calls for billing, credit and  
11 service departments were separated into three phone queues. Billing, credit, and service  
12 calls and were answered by representatives assigned exclusively to answering billing,  
13 credit, or service calls.

14 Training for the service, billing, and credit positions varied considerably. Job  
15 applicants were hired specifically for service, credit or billing positions and attended  
16 training specific to their positions. Service representatives received two weeks of basic  
17 classroom training, focusing mainly on the products and repair services the Company  
18 provided to consumers, plus several weeks of sitting with an on-the-job representative,  
19 before answering calls on their own.

20 In contrast, credit and billing representatives had a lot more initial class room and  
21 on the job training. Additionally, this training was more intensive and related to various  
22 state regulations affecting utilities credit and billing issues (respectively). Credit and  
23 billing representatives were also required to attend on-going classroom training and  
24 mentoring throughout their first two years at the Company and observe seasoned credit  
25 and billing representatives (respectively). New credit and billing representatives were  
26 unlikely to answer calls on their own for several months after beginning work at the Call

1 Center. Complete training of new billing representatives took approximately two years.  
2 Finally, service representatives were paid less than credit and billing representatives.

3  
4 Q: What led to the creation of the Universal Representative and Senior  
5 Representative Positions?

6  
7 A: From winter 2000 to spring 2003, the Call Center lost a significant portion of its  
8 staff due to attrition and transfers. This was compounded by NiSource ordering a hiring  
9 freeze around the same time, announced by Gary Neale on December 7, 2001. (*See* Letter  
10 from Gary Neale to all NiSource Employees, attached hereto as Exhibit JA-1.) Staffing  
11 in the Call Center went from almost 70 full time employees to the low fifties. As a result,  
12 there was a serious shortage of staff at the Call Center. All Call Center representatives  
13 were consistently asked to do overtime to meet regulatory standards in Massachusetts,  
14 New Hampshire, and Maine. More importantly, service, billing and credit  
15 representatives were being forced to take all types of calls by their managers, even  
16 though they weren't trained to take all calls and had no way of responding appropriately  
17 to the calls. CSRs were bluffing their way through calls. Additionally, billing and credit  
18 representatives were being paid more than service representatives to do the same work.  
19 As a result, morale was down significantly.

20 As a result of the change in job duties, the Union filed an arbitration grievance.  
21 The Union and the Company ultimately executed memorandums of agreement  
22 guaranteeing unit members higher wages in exchange for the creation of universal and  
23 senior universal representatives.

24  
25 Q: Did these temporary transfers between service, credit, and billing representatives  
26 take place before or after the Customer Information System ("CIS") was installed?  
27

1 A: The temporary transfers took place over a year after the CIS system was installed.

2

3 Q: How many Universal Senior Representatives are employed by the Call Center,  
4 and how many work each shift?

5

6 A: There are eight Universal Senior Representatives; they work Monday through  
7 Friday on eight hour shifts starting between 7:00 a.m.-9:00 a.m. and ending between 3:30  
8 p.m.-5:30 p.m.

9

10 Q: What are your job duties as a Senior Universal Representative?

11

12 A: I have many job duties; these duties rotate between Senior Universal  
13 Representatives on a consistent basis. I perform back-up billing, service and credit  
14 work. This means that I process billing, service, and credit calls and correct errors in the  
15 CIS database after universal representatives have taken initial customer calls and placed  
16 them on the CIS. I also take calls from disgruntled customers or customers that have  
17 complicated calls that Universal Representatives are not able to handle on their own and  
18 serve on the "help queue," providing Universal Representatives additional technical  
19 assistance when they are dealing with a difficult call.

20

21 Q: Do you have any other job duties?

22

23 A: Yes. I process all paperwork from customers into the Call Center. For instance, I  
24 process papers related to accounts that are protected from shut-off due to financial  
25 hardship or special circumstances. I also process identification for the setting up of new  
26 accounts. If a customer's social security number cannot be verified through the data base  
27 to verify identify. I also process receipts demonstrating proof of payment on accounts so  
28 that service may be turned back on.

1

2 Q: What proportion of your job does processing customer paperwork constitute?

3

4 A: The processing of paperwork from customers makes up approximately ¼ of my  
5 job.

6

7 Q: Why does processing customer paperwork take up so much of your time?

8

9 A: After NiSource purchased the Company, one of its first changes was to close all  
10 of the walk-in customer service centers that had been located in each of the Company's  
11 facilities. This change was effective as of June 1, 2001. One of the primary roles these  
12 centers had was to verify identification so that new customers could be signed up for  
13 service. After the closing of the walk-in customer service center, Call Center volume  
14 increased considerably.

15

16 Q: Do you have any other job duties?

17

18 A: Yes. I am supposed to provide on-going refresher training to the Universal  
19 Representatives when business conditions allow. Since I have become a Senior  
20 Universal Representative, almost one year ago, I have not had time to perform this type  
21 of training.

22

23 Q: Do you have any other job duties?

24

25 A: Yes. As a Universal Senior Representative, I am responsible for taking calls from  
26 DTE officers regarding any complaints made to DTE by consumers. The other Senior  
27 Universal Representatives and I are required to catalogue every complaint that we get  
28 from DTE, the New Hampshire Public Utilities Commission and the Maine Public

1 Utilities Commission. All complaints are kept in the DTE complaint log database. The  
2 complaint log is managed by Virginia Anthony.

3  
4 Q: Are there any other job duties that you have as a Senior Universal Representative?

5  
6 A: When it gets busy, I must support the Universal Representatives by backing up  
7 phones.

8  
9 Q: How often are you required to back up the phones?

10  
11 A: Every Monday I perform back up on the phones. Additionally, several times  
12 every week during the later part of the day, I back up the phones.

13  
14 Q: Do you have any other job duties?

15  
16 A: Yes. Universal Senior Representatives support our Supervisors by investigating  
17 claims or retrieving information on billing, service, and credit issues.

18  
19 Q: Do you have any other job duties?

20  
21 A: No.

22  
23 Q: What are the Call Center's current hours of operation? Have the hours changed  
24 over the last few years? If so, provide the hours of operation before the change.

25  
26 A: The Call Center's hours changed in 2003. Prior to 2003, the Call Center was  
27 open between 6:00 a.m.-12:00 a.m., Monday through Friday; the call center was open  
28 Saturday and Sunday from 7:00 a.m. to 10:00 p.m. Since 2003, the Call Center hours are  
29 more limited. The Call Center is open from 6:00 a.m.-10:00 p.m., Monday through  
30 Friday and Saturday 6:00 a.m.-7:00 p.m. for service, repair and emergency calls. The

1 Call Center is only open from 8:00 a.m. to 5:00 p.m., Mondays-Fridays, for credit and  
2 billing calls.

3  
4 Q: How many bargaining unit members are currently employed at the Call Center?

5  
6 A: There are seventy (69) unit members currently employed at the Call Center.  
7 Fifty-one (51) are full-time and eighteen (18) are part-time employees.

8  
9 Q: Has the proportion of full-time and part-time Call Center employees changed  
10 between 1998, when the Call Center was consolidated to take all Bay State Gas Company  
11 and Northern Gas service, billing, and credit calls, and 2005?

12  
13 A: Yes, historically, Call Center staffing was in the low seventies and only four of  
14 the Call Center employees were part-time.

15  
16 Q: When did the proportion of part-time and full-time employees change?

17  
18 A: Shortly after NiSource bought out Bay State and merger was completed, the  
19 Company stopped replacing empty Call Center positions lost to attrition, transfers, and  
20 retirements. On December 7, 2001, Gary Neale announced formally to all employees that  
21 there would be a hiring freeze. *See* JA-1. As a result, Call Center staffing shrunk  
22 considerably. For instance, in November 2000, there were seventy-four (74) union  
23 members employed in the service, credit and billing departments serving the Company  
24 and Northern Utilities. By April 2002, there were only forty-seven (47) bargaining unit  
25 members working as service, billing, and credit representatives serving the Company and  
26 Northern Utilities.

27  
28 Q: What happened when the Call Center staff shrunk to such a low level?  
29



1 A: As I stated above, all Call Center staff was required to take service, billing, and  
2 credit calls, despite the fact many had training in only one of the three Call Center  
3 functions. This was so that we could meet Massachusetts, New Hampshire and Maine  
4 Service Quality Indicators (“SQI”). Additionally, overtime was consistently requested  
5 by our managers to meet our service quality numbers.

6  
7 Q: Was the Company successful at meeting the Service Quality Indicators during this  
8 time?

9  
10 A: No, many times during this period, the Company and its affiliate, Northern  
11 Utilities, were required to pay fines to the state regulatory agencies. For example, on  
12 review of the Company’s responses to USWA 2-20, it is apparent that the Company paid  
13 fines to Massachusetts for CY 2000 and CY 2001 and Northern Utilities paid fines to  
14 New Hampshire for January-June 2003 and February-March 2004. I am not sure what  
15 other months they were out of compliance in Massachusetts, because Massachusetts SQIs  
16 were reported annually; the Company did not communicate with us that they failed to  
17 make their SQIs very often.

18  
19 Q: Were there any other signs that the Company was not meeting its Service Quality  
20 goals?

21  
22 A: Yes, when I covered the phones periodically during this period as a Senior Billing  
23 Representative, I would often receive calls from customers in which they told me that  
24 they had had a very hard time getting through to Customer Service. I was told by  
25 customers repeatedly that they had called multiple times, but only gotten a busy signal.

26  
27 Q: Why would they get a busy signal?  
28

1 A: Customers would get a busy signal if the trunk line that they called into had been  
2 shutdown.

3  
4 Q: What is a trunk line?

5  
6 A: A trunk line is a multi-line phone line that allows a substantial number of callers  
7 to queue on the line until their calls are answered.

8  
9 Q: What would be the effect of shutting off the trunk line off?

10  
11 A: Shutting off the trunk line would limit the number of customers on the queue to  
12 the available number of open lines for the Call Center. If all of the Call Center lines were  
13 taken, a caller would get a busy signal instead of waiting on queue to have their call  
14 answered.

15  
16 Q: Would customers getting busy signals be recorded in the Company's Customer  
17 Information System regarding the number of calls to the Call Center and the time elapsed  
18 before the call was answered?

19  
20 A: No.

21  
22 Q: Between January 2001 and January 2004, were you ever told that the trunk lines  
23 had been shut down?

24  
25 A: Yes. At some point in late 2002 the Union had a meeting with Pat Teague, my  
26 boss, to discuss the chronic staffing shortage. We wanted the Company to post open Call  
27 Center positions. Pat indicated that a number of the trunk lines were shut off to take  
28 pressure off the call volume the Call Center was getting, but that now, the trunk lines had  
29 to be re-opened.

30  
31 Q: What is Pat Teague's title and how long has she been your boss?

32

1 A: Pat Teague has been my supervisor at the Call Center for five and a half (5 ½)  
2 years. Her title is Call Center Manager.

3  
4 Q: Did the Company take any steps to correct the shortage of Call Center workers?  
5 When did it take these steps?

6  
7 A: Yes. Sometime in late 2002-early 2003 they began hiring temporary employees  
8 to cover phones. Then, in spring 2003, the Company started filling open full-time  
9 positions with part-time positions. Additionally, the Company requested that all unit  
10 members work significant overtime.

11  
12 Q: Are staffing levels sufficient now?

13  
14 A: I do not believe so. We struggle to make the Service Quality Indicators for Bay  
15 State and Northern Utilities every month. Overtime is available every day. I have been  
16 told by my supervisors that at least 66-67 full-time equivalent call center employees are  
17 necessary to run the Springfield Center. Right now we have 52 full-time and 18 part-time  
18 workers.

19  
20 Q: How many hours a week may part-time employees work?

21  
22 A: Under the collective bargaining between the Union and the Company, they can  
23 work up to thirty-two (32) hours. Under the contract, part-time workers cannot work  
24 more than 40 hours, and they cannot work overtime. Many part-time Call Center workers  
25 work close to thirty-five hours (32) a week.

26  
27 Q: What benefits do part-time employees receive?  
28

1 A: Prior to May 1, 2004, part-time employees did not get health insurance benefits,  
2 sick time, or premium rate pay if they worked during the weekend or nights. Full-time  
3 employees received all of these benefits.

4 Since May 1, 2004, part-time employees now receive sick time and premium pay  
5 for working weekends, but they still do not receive any health insurance benefits from the  
6 Company. Part-time employees may purchase health plans, at full cost, from the  
7 Company.

8  
9 Q: Has the Company taken any other measures to increase the SQIs for the Company  
10 and Northern Utilities?

11  
12 A: Since staffing was at an all time low in 2001-2002, the Company has, on a regular  
13 basis, used Call Center employees to answer calls and take messages exclusively, rather  
14 than completing customer billing, credit, and service calls.

15  
16 Q: What was the purpose of this practice?

17  
18 A: To get calls off hold and out of the queues so that the Company would be more  
19 likely to meet its SQIs.

20  
21 Q: How often did the Company assign Call Center staff to answering calls and taking  
22 messages exclusively?

23  
24 A: During some high call volume months, *e.g.*, May, September, October,  
25 November, Call Center staff were assigned to taking messages on a daily basis. During  
26 some other months, Call Center staff was assigned to taking messages only during peak  
27 times, such as the end of month when the Company or Northern Utilities were in  
28 jeopardy of missing their Service Quality Indicators.

29

1 Q: Were there any other methods used by the Company during this period to improve  
2 Service Quality Indicators for either the Company or Northern Utilities?

3  
4 A: There was a period from winter 2002- spring 2003 in which the Call Center was  
5 unable to meet its Service Quality indicators for New Hampshire. At this time, things  
6 were so bad that the New Hampshire Public Utilities Commission required Northern  
7 Utilities to provide a report of its service quality indicators on a monthly, rather than a  
8 quarterly, basis. In March 2003, the Company sent out an e-mail requesting volunteers to  
9 staff lines exclusively dedicated to Northern Utilities customers. I have provided a copy  
10 of this e-mail, dated March 21, 2003, attached hereto as Exhibit JA-2.

11  
12 Q: Had the Company ever sent out a notice like this before?

13  
14 A: No.

15  
16 Q: How long did this practice go on?

17  
18 A: This practice went on for at least year. There were some Call Center employees  
19 who were assigned to the Northern Utilities queue for three months straight, without  
20 rotating at all to the Bay State queue.

21  
22 Q: How many Call Center employees were assigned to the Northern Utilities queue  
23 at one time?

24  
25 A: Sometimes there were as many as ten (10) employees assigned exclusively to  
26 answering Northern Utilities calls.

27  
28 Q: What impact, if any, did this practice has on Massachusetts customers?

29  
30 A: Maine and New Hampshire customers had a dedicated number of Call Center  
31 employees answering their calls. These Call Center employees could not answer calls

1 from Massachusetts callers. Ordinarily, these call center employees would have been  
2 available to answer all credit, service, and billing calls, including those from  
3 Massachusetts. As a result, the Massachusetts credit, service and billing queues were not  
4 staffed with as many available representatives. Additionally, DTE levied fines upon the  
5 Company for failing to meet its Service Quality Indicators during this period.

6  
7 Q: Where do the bulk of calls to the Call Center come from?

8  
9 A: Massachusetts.

10  
11 Q: Had the Company ever assigned employees to answer Northern Utilities calls  
12 exclusively before?

13  
14 A: No.

15  
16 Q: Has the Company taken any other measures to improve its Service Quality  
17 Indicators?

18  
19 A: Yes, overtime is available every day at the Call Center, and during the last of half  
20 of the month, the supervisors actively seek out multiple volunteers to cover overtime so  
21 that the Center will make its Service Quality Indicators for the month.

22  
23 Q: I am going to ask you some questions about the Company's communications with  
24 the Union about NiSource's contract with IBM Global Services and its probable effect on  
25 Union members. When did you first hear that the Company was considering outsourcing  
26 employees?

27  
28 A: The Union was first told that outsourcing might occur at the Call Center in  
29 February 2005.

30  
31 Q: Who told you, and what is his or her title?  
32

1 A: Jay Moore first told us. He is the Human Resources Manager for Bay State Gas-  
2 Northern Utilities Human. However, all written materials relating to outsourcing that I  
3 have received as an employee or Union official have come from NiSource.

4  
5 Q: Did Moore explain the Company's process in deciding whether to outsource the  
6 Call Center?

7  
8 A: Yes, but only in the most general terms. He told us that the NiSource would be  
9 seeking proposals and no decisions had been made. Then when IBM was selected in  
10 April 2005, he continued to tell us that no decision regarding outsourcing had occurred.  
11 Even after the "definitive contract" between NiSource and IBM was signed on June 20,  
12 2005, he has maintained that no decision has been made. Since June 21, 2005, I have seen  
13 a number of newspaper reports and press releases stating that IBM and the Company  
14 have reached an agreement and that 1,017 NiSource employees will either be eliminated  
15 or outsourced.

16  
17 Q: Did Moore or any other Company official state how many Call Center positions  
18 would be outsourced under NiSource's agreement with IBM?

19  
20 A: No. I have not been given any specifics; we have been told repeatedly that "No  
21 decisions have been made yet" about outsourcing.

22  
23 Q: Is there anything happened or that you have seen that suggests the Company is  
24 planning to outsource Call Center workers?

25  
26 A: On or around May 24, 2005, Joseph Carlson, the United Steelworkers Business  
27 Representative assigned to USWA Local 12026 and I were called to meet with Jay Moore  
28 at approximately 10:00 a.m. Using a script provided by NiSource, Moore told me that  
29 the Company wanted to pass out forms to employees and that the purpose of this form

1 was to give employees an “opportunity” to share work histories with IBM. Moore also  
2 said that the Company intended to dispense the forms at 12:00 p.m.

3 When I requested a copy of the document he wanted to pass out to bargaining unit  
4 members, he refused. He also would not explain how the work histories were going to be  
5 used by IBM. Because Moore refused to let us see the form, the Union refused to allow  
6 the Company to send out the forms. To date, the forms have gone out to all non-union  
7 employees only.

8  
9 Q: Has the Company made any public statements to employees at the Call Center or  
10 in Springfield, Massachusetts generally, regarding the outsourcing of positions to IBM or  
11 a second-tier contractor.

12  
13 A: Yes. The Company began holding meetings with small groups of employees on  
14 June 21, 2005. I came to work on June 21, 2005 at about 8:00 a.m. At 8:25 a.m., I  
15 started getting calls from bargaining unit members in the Springfield revenue recovery  
16 department saying that they had met with their managers. Their managers, using a script  
17 provided by NiSource, told them that the department was being considered for  
18 outsourcing. The script also stated that the Company needed to meet with the Union first  
19 to negotiate.

20 Later, Pat Teague, my supervisor, did a session for Call Center employees, which  
21 I attended, using a similar script. She stated that the Company wanted to outsource the  
22 entire Call Center, but that they had to meet with the Union before it could be announced.

23  
24 Q: Did the Union receive any notice from the Company before this announcement  
25 was made?

26  
27 A: No. The Union’s business representative, Joseph Carlson, did not receive notice  
28 until at least 9:06 a.m., when he was faxed a letter containing information regarding the



1 scheduling of a meeting to discuss outsourcing from the Company, regarding this  
2 announcement. The Company did not provide Carlson with a copy of the script that  
3 managers were using to announce the IBM-NiSource contract and the likelihood of  
4 outsourcing.

5  
6 Q: Did the Union request and receive a copy of the script that was used by the  
7 Company managers on June 21, 2005?

8  
9 A: Yes, I requested and received a copy of the script from Jay Moore; it is attached  
10 hereto as Exhibit JA-3.

11  
12 Q: When was the last collective bargaining agreement between the Union and the  
13 Company executed, and what is the contract's duration?

14  
15 A: The last collective bargaining agreement was signed May 2004; the contract is  
16 effective from May 2004 to May 2010.

17  
18 Q: Is there a re-opener clause in the contract?

19  
20 A: No.

21  
22 Q: Is there a clause within the contract granting the Company permission to  
23 outsource bargaining unit work?

24  
25 A: No. In fact, a number of provisions within the agreement suggest that outsourcing  
26 is not permissible under the contract. Article IV(4) allows the use of *agency employees*  
27 only on a temporary basis and only under limited conditions, none of which are satisfied  
28 here. Under Article III(1), layoffs of employees may occur only for a *lack of work*; the  
29 outsourcing of bargaining unit work would inevitably cause layoffs without the requisite  
30 lack of work. Additionally, Article X requires that any vacancies that occur must be  
31 filled by posting and bidding and not by going to outside contractors. Finally, the

1 outsourcing of bargaining unit work would be a violation of the Company's agreement  
2 not to discriminate against members of the Union under Article III(1).

3  
4 Q: If the Company were to outsource bargaining unit work, what would they be  
5 liable for?

6  
7 A: They would be liable for full contract damages. **The contract specifies the**  
8 **wages and benefits of all unit members during the contract period.**

9  
10 Q: What is the proportion of men and women in the bargaining unit, and what is the  
11 average age of bargaining unit members?

12  
13 A: 90% of the bargaining unit members are women; on average, Union members are  
14 in their mid-thirties.

15  
16 Q: How many union members constitute the primary earners in their families?

17  
18 A: A significant number of our bargaining unit members are primary breadwinners in  
19 their families; union members also tend to be their families' sole source of health  
20 insurance. In the Call Center, 52 of the 69 Union members on staff are the primary  
21 breadwinners and sole source of health insurance for their families.

22  
23 Q: What is average level of educational attainment among bargaining unit members?

24  
25 A: High school diploma, although many have taken some college courses.

26  
27 Q: If the Call Center were to close, where would bargaining unit members find  
28 comparable jobs?

29  
30 A: There are few, if any, comparable jobs for members of the bargaining unit in  
31 Western Massachusetts. In 2003, the Union did internet research on comparable clerical

1 jobs in the Western Massachusetts area. Other utilities were the only jobs that provided  
2 comparable wages and benefits. These jobs are few and far between.

3 Under the agreement between the Union and the Company, the pay scale for  
4 bargaining unit members is between \$15.00 and \$22.00 an hour. Because the great  
5 majority of unit members have at least 16 years with the Company, most bargaining unit  
6 members are making between \$17.00-\$18.00 an hour.

7

8 Q: Does this complete your testimony?

9

10 A: Yes it does.

11

12